



a full year and two months before the beginning of, and six months after the close of, the purported Class Period.

WHEREFORE, for the foregoing reasons, and those stated in the accompanying memorandum of law, defendant Sonus Networks, Inc. respectfully requests that the Court:

- A. Enter a protective order:
  - 1. Precluding Lead Plaintiff from pursuing further discovery from any defendant or third party relating to the allegations dismissed by the Court, or otherwise outside the limited claims and allegations affirmed by the Court in its May 10, 2006 Order, and
  - 2. Limiting the time period for discovery to January 1, 2001 through September 30, 2004;
- B. Award attorney's fees and costs to defendant Sonus; and
- C. Grant such further relief that the Court deems fair and just.

### **REQUEST FOR ORAL ARGUMENT**

Defendant Sonus Networks, Inc. believes that oral argument may assist the Court in deciding the issues presented by this motion, and accordingly requests a hearing pursuant to Local Rule 7.1(D).

Respectfully Submitted,

/s/Sherry Hartel Haus  
Jeffrey B. Rudman (BBO #433380)  
James W. Prendergast (BBO #553073)  
Sherry Hartel Haus (BBO #663777)  
Melissa B. Coffey (BBO #660750)  
Wilmer Cutler Pickering Hale and Dorr LLP  
60 State Street  
Boston, MA 02109  
(617) 526-6000  
*Attorneys for Sonus Networks, Inc.*

Dated: September 5, 2007

**DEFENDANT SONUS NETWORKS, INC'S**  
**RULE 26(c) AND LOCAL RULES 7.1(A) AND 37.1(B) CERTIFICATION**

Pursuant to Federal Rule of Civil Procedure 26(c), and Local Rules 7.1(A)(2) and 37.1(B), counsel for defendants Sonus Networks, Inc. hereby certifies that by e-mails dated August 28, 29, and 30, 2007 and teleconference on September 4, 2007, she conferred in good faith with opposing counsel regarding Defendant Sonus Networks, Inc.'s Motion for Protective Order to Preclude Discovery on Dismissed and Unpleaded Claims and Allegations and to Limit Discovery to a Reasonable Time Period, and was unable to resolve the matters at issue in this motion.

Respectfully Submitted,

/s/Sherry Hartel Haus  
Jeffrey B. Rudman (BBO #433380)  
James W. Prendergast (BBO #553073)  
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60 State Street  
Boston, MA 02109  
(617) 526-6000  
*Attorneys for Sonus Networks, Inc.*

Dated: September 5, 2007

**CERTIFICATE OF SERVICE**

I, Sherry Hartel Haus, hereby certify that on September 5, 2007, I caused a true copy of the foregoing document to be served electronically via the Court's Electronic Filing System upon all counsel of record.

/s/Sherry Hartel Haus  
Sherry Hartel Haus